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September 11, 2023

VIA ECF

The Honorable Alvin K. Hellerstein
Senior United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Shangzhen Wu*
23 Cr. 90 (AKH)

Dear Judge Hellerstein:

Please recall that I represent Mr. Shangzhen Wu in his defense of the above-referenced matter. Mr. Wu is next scheduled to appear before Your Honor on September 21, 2023, at 2:15 p.m. for a status conference. For the reasons that follow, I write to respectfully request that Your Honor grant a modification of Mr. Wu's bond conditions to remove the condition of home incarceration and impose the condition of home detention to enable Mr. Wu to leave his home and obtain employment with the pre-approval of United States Pretrial Services ("Pretrial Services"). A.U.S.A. Jerry Fang advised that the Government consents to the instant request, and Pretrial Services Officer Courtney DeFeo advised that Pretrial Services for the Southern District of New York has no objection.

On March 2, 2023, Mr. Wu was arraigned before United States Magistrate Judge Gabriel W. Gorenstein. Judge Gorenstein set conditions of release on a \$50,000.00 personal recognizance bond to be co-signed by two financially responsible persons and secured by \$5,000.00 cash. Judge Gorenstein also set the following conditions of release: supervision by Pretrial Services as directed; surrender all travel documents and no new applications for travel documents; travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; home incarceration; location monitoring as directed by Pretrial Services; and no contact with witnesses or alleged victims. Judge Gorenstein further ordered that Mr. Wu cannot possess the identifying information of others or open any new bank accounts, and if Mr. Wu is released, he is to reside at his residence in Jersey City, New Jersey. Mr. Wu met his bond conditions and was released from custody on June 9, 2023.

So ordered
9.12.23
[Signature]

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If granted the requested modification from home incarceration to home detention, Mr. Wu would be permitted to leave his home for trips that are pre-approved by Pretrial Services, in accordance with the following understandings agreed to by the defense and the Government: (1) all requests for trips must be made in writing and state the name and address of where Mr. Wu intends to go and at what time; (2) approval is at the sole discretion of Pretrial Services and must be in writing; (3) Pretrial Services may revoke any prior approval at its discretion; and (4) Mr. Wu must submit all requests at least 24 hours in advance of a planned trip. In addition, the requested modification would permit Mr. Wu to obtain employment if approved by Pretrial Services. All other conditions of Mr. Wu's release are to remain in place.

Finally, the defense has no objection to the exclusion of time through the next status conference date, September 21, 2023, under the Speedy Trial Act.

Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Jerry Fang (via ECF)
A.U.S.A. Henry Ross (via ECF)
Mr. Shangzhen Wu (via email)